# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION	Civil No. 18-1776 (JRT/HB)
This Document Relates to:	DECLARATION OF DIANNE M. NAST IN SUPPORT OF
ALL CONSUMER INDIRECT PURCHASER ACTIONS	PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES SUBMITTED ON BEHALF OF NASTLAW LLC

- I, Dianne M. Nast, hereby declare and state as follows:
- 1. I am the owner of NastLaw LLC. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.
  - 2. My firm and I serve as Counsel in this matter for Plaintiffs.
- 3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the period from inception of the case through June 30, 2021. The total number of hours spent by my firm during this time period was 5.2 hours with a corresponding current lodestar of \$4,688. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by the firm. The

<sup>&</sup>lt;sup>1</sup> Such time does not include any time expended in completing this declaration.

lodestar amount reflected in Exhibit 1 is for work assigned by Plaintiffs' Co-Lead Counsel and was performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time period. In preparing this time I followed Lead Counsel's protocol for time keeping and assignments and have audited my time to comply with that protocol. In connection with representing Plaintiffs in the Action, my firm did the following: assisted with drafting and filing a class action complaint in the District of Minnesota captioned Realdine et al v. Agri Stats, Inc. et al (18-cv-02044); attended conference calls and shared correspondence with co-counsel regarding information discussed at status conferences and interactions with defense counsel; met with co-counsel regarding preservation of documents letters for named class representatives; and worked with co-counsel to identify additional class representatives from several states. These are examples of the work undertaken by NastLaw LLC in this litigation. The firm's time records, submitted throughout the course of this litigation, fully describes the work, which helped to bring a successful conclusion to the litigation.

- 4. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit A are the usual and customary hourly rates charged by my firm in similar complex litigation matters.
- 5. My firm is not seeking the reimbursement of costs associated with this case.

I declare that the foregoing information is true and correct. Executed on October 5, 2021 in Philadelphia, Pennsylvania.

s/Dianne M. Nast

Dianne M. Nast, Esquire NASTLAW LLC 1101 Market Street, Suite 2801 Philadelphia, Pennsylvania 17601

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### **EXHIBIT 1**

#### NASTLAW LLC

## **Reported Hours and Lodestar**

Inception through June 30, 2021

Timekeeper	Professional Status	Hours	Current Rate	Total Lodestar
Dianne M. Nast	P	3.4	\$995	\$3,383
Erin C. Burns	A	1.8	\$725	\$1,305
Grand Tota	al	5.2		\$4,688

#### **Role Legend**

P Partner/Shareholder

OC Of Counsel

A Associate

LC Law Clerk

PL Paralegal

I Investigator

SA Staff Attorney

CA Contract Attorney